EXHIBIT 1

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FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION, Plaintiff, v. DAMIAN KUTZNER, individually and as an officer of BROOKSTONE LAW P.C. (California), BROOKSTONE LAW P.C. (Nevada), ADVANTIS LAW P.C., and ADVANTIS LAW GROUP P.C.;VITO TORCHIA, JR., individually and as an officer of BROOKSTONE LAW P.C. (California) and BROOKSTONE LAW P.C. (Nevada); JONATHAN TARKOWSKI, individually and as an officer of BROOKSTONE LAW P.C. (California) and BROOKSTONE LAW P.C. (Nevada); R. GEOFFREY BRODERICK, individually and as an officer of ADVANTIS LAW P.C. and ADVANTIS LAW GROUP P.C.; CHARLES T. MARSHALL, individually and as an officer of ADVANTIS LAW P.C. and ADVANTIS LAW GROUP P.C.; BROOKSTONE LAW P.C., d/b/a BROOKSTONE LAW GROUP, a California professional corporation; BROOKSTONE LAW P.C., d/b/a BROOKSTONE LAW GROUP, a Nevada	**Case No. CV16-00999-BRO (AFMx)** **EX PARTE TEMPORARY RESTRAINING ORDER WITH ASSET FREEZE, APPOINTMENT OF TEMPORARY RECEIVER, LIMITED EXPEDITED DISCOVERY, AND OTHER EQUITABLE RELIEF, AND ORDER TO SHOW CAUSE WHY PRELIMINARY INJUNCTION SHOULD NOT ISSUE** **[LODGED UNDER SEAL]**

professional corporation; ADVANTIS LAW P.C., a California professional corporation; and ADVANTIS LAW GROUP P.C., a California professional corporation,

Defendants.

Plaintiff, the Federal Trade Commission ("FTC"), pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), and the 2009 Omnibus Appropriations Act, Public Law 111-8, Section 626, 123 Stat. 524, 678 (Mar. 11, 2009) ("Omnibus Act"), as clarified by the Credit Card Accountability Responsibility and Disclosure Act of 2009, Public Law 111-24, Section 511, 123 Stat. 1734, 1763-64 (Mar. 22, 2009) ("Credit Card Act"), and amended by the Dodd-Frank Wall Street Reform and Consumer Protection Act, Public Law 111-203, Section 1097, 124 Stat. 1376, 2102-03 (July 21, 2010) ("Dodd-Frank Act"), 12 U.S.C. § 5538, has filed a complaint to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, disgorgement of ill-gotten monies, and other equitable relief for Defendants' acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the Mortgage Assistance Relief Services Rule ("MARS Rule"), 16 C.F.R. Part 322, recodified as Mortgage Assistance Relief Services, 12 C.F.R. Part 1015 ("Regulation O"), and has applied for a temporary restraining order pursuant to Rule 65(b) of the Federal Rules of Civil Procedure.

FINDINGS OF FACT

This Court, having considered the FTC's Complaint, *ex parte* application, declarations, exhibits, and memoranda filed in support of the FTC's application, and the evidence presented, finds the facts in its Order dated June 1, 2016 (Dkt. No. 22.):

DEFINITIONS

For the purposes of this Temporary Restraining Order, the following definitions apply:

A. **"Asset"** or **"Assets"** means any legal or equitable interest in, right to, or claim to, any and all real and personal property of Defendants, or held for the benefit of Defendants, wherever located, whether in the United States or abroad, including but not limited to chattel, goods, instruments, equipment, fixtures, general intangibles, effects, leaseholds, contracts, mail or other deliveries, inventory, checks, notes, accounts, credits, receivables (as those terms are defined in the Uniform Commercial Code), shares of stock, futures, all cash or currency, and trusts, and shall include both existing Assets and Assets acquired after the date this order is signed, or any interest therein.

B. "**Asset Freeze Accounts"** includes accounts that are held by or for the benefit of, or controlled by, directly or indirectly, any Corporate Defendant, Individual Defendant, Broad Base Inc., Federal Management Systems Inc., Black Gold Leasing Inc., Doheny Development Corporation, HTM LLC, Liberty Management Group Inc., Scripts Development Inc., Serious Pimp Inc., UHG Inc., United Holdings and Acquisitions Inc., Vizcayan Corporation, and ZEC Management Corp. Asset Freeze Accounts also includes the following accounts, identified by the account holder, the Financial Institution, and last four digits of the account number:

1. Advantis Law, Bank of America, No. unknown;
2. Advantis Law, California Republic Bank, No. unknown;
3. Black Gold Leasing Inc., JPMorgan Chase, 7178;
4. Broad Base Inc., JPMorgan Chase, 3379;
5. Broad Base Inc., JPMorgan Chase, 3819;
6. Brookstone Law P.C., JPMorgan Chase, 9552;

7. Brookstone Law P.C., JPMorgan Chase, 8561;
8. Brookstone Law P.C., JPMorgan Chase, 7928;
9. Brookstone Law P.C., JPMorgan Chase, 8769;
10. Brookstone Law P.C., JPMorgan Chase, 8819;
11. Brookstone Law P.C., JPMorgan Chase, 6317;
12. Brookstone Law P.C., JPMorgan Chase, 9052;
13. Brookstone Law P.C., Bank of America, 0081;
14. Brookstone Law P.C., Bank of America, 0097;
15. Brookstone Law P.C., Bank of America, 0098;
16. Brookstone Law P.C., Bank of America, 0099;
17. Brookstone Law P.C., Bank of America, 2747;
18. Brookstone Law P.C., Bank of America, 2748;
19. Brookstone Law P.C., Bank of America, 2909;
20. Brookstone Law P.C., Bank of America, 3466;
21. Brookstone Law P.C., Bank of America, 8722;
22. Brookstone Law P.C., Bank of America, 8735;
23. Brookstone Law P.C., Bank of America, 7366;
24. Brookstone Law P.C., CitiBank, No. unknown;
25. Charles T. Marshall, JPMorgan Chase, 4691;
26. Charles T. Marshall, JPMorgan Chase, 4708;
27. Charles T. Marshall, JPMorgan Chase, 6085;
28. Charles T. Marshall, JPMorgan Chase, 7957;
29. Charles T. Marshall, JPMorgan Chase, 8120;
30. Charles T. Marshall, JPMorgan Chase, 2107;
31. Charles T. Marshall, Bank of America, 1763;
32. Damian Kutzner, JPMorgan Chase, 9111;
33. Doheny Development Corp., JPMorgan Chase, 5983;

34. Federal Management Systems Inc., JPMorgan Chase, 2850;

35. Geoffrey Broderick, JPMorgan Chase, 9253;

36. Geoffrey Broderick, JPMorgan Chase, 3571;

37. Geoffrey Broderick, JPMorgan Chase, 4891;

38. Geoffrey Broderick, JPMorgan Chase, 9914;

39. Geoffrey Broderick, JPMorgan Chase, 6319;

40. Geoffrey Broderick, JPMorgan Chase, 9209;

41. Vito Torchia, JPMorgan Chase, 8371;

42. Vito Torchia, JPMorgan Chase, 3853;

43. Vito Torchia, JPMorgan Chase, 7060;

44. Vito Torchia, JPMorgan Chase, 8993;

45. Vito Torchia, JPMorgan Chase, 5587;

46. Vito Torchia, JPMorgan Chase, 7490;

47. Vito Torchia, JPMorgan Chase, 9320; and

48. Vizcayan Corporation, JPMorgan Chase, 7307.

C. **"Assisting others"** includes but is not limited to: (1) performing customer service functions, including, but not limited to, receiving or responding to consumer complaints; (2) formulating or providing, or arranging for the formulation or provision of, any advertising or marketing material, including but not limited to, any telephone sales script, direct mail solicitation, or the design, text, or use of images of any Internet website, email, or other electronic communications; (3) formulating or providing, or arranging for the formulation or provision of, any marketing support material or service, including but not limited to, web or Internet Protocol addresses or domain name registration for any Internet websites, affiliate marketing services, or media placement services; (4) providing names of, or assisting in the generation of, potential customers; (5) performing or providing marketing, billing, or payment services of any kind; (6) acting or serving as an owner, officer, director, manager, or principal of any entity; (7) providing telemarketing services; or (8) consulting with regard to any of the above.

D. **"Corporate Defendants"** means, collectively, Advantis Law P.C., Advantis Law Group P.C., Brookstone Law P.C. (California), Brookstone Law P.C. (Nevada), and their successors, assigns, affiliates, or subsidiaries, and each of them by whatever names each might be known.

E. **"Defendants"** means all Individual Defendants, Corporate Defendants, and their successors, assigns, affiliates, subsidiaries, or agents, individually, collectively, or in any combination, and each of them by whatever names each might be known.

F. **"Document"** is synonymous in meaning and equal in scope to the terms "Document" and "electronically stored information," as described and used in the Federal Rules of Civil Procedure. This includes, but is not limited to, electronic mail, instant messaging, videoconferencing, and other electronic correspondence (whether active, archived, or in a deleted items folder), word processing files, spreadsheets, databases, and video and sound recordings, whether stored on: cards; magnetic or electronic tapes; disks; computer hard drives, network shares or servers, or other drives; cloud-based platforms; cell phones, PDAs, computer tablets, or other mobile devices; or other storage media.

G. **"Electronic Data Host"** means any person or entity in the business of storing, hosting, or otherwise maintaining electronically stored information. This includes, but is not limited to, any entity hosting a website or server, and any entity providing "cloud based" electronic storage.

H. **"Financial Institution"** means any bank, savings and loan institution, credit union, payment processor, trust, or any financial depository of any kind, including but not limited to, any brokerage house, trustee, broker-dealer, escrow agent, title company, commodity trading company, or precious metal dealer.

I. **"Individual Defendants"** means, collectively, Damian Kutzner, Vito Torchia, Jonathan Tarkowski, Geoffrey Broderick, Charles Marshall, and any other names they may have used, be known by or have been known by.

J. **"Mortgage assistance relief product or service"** or **"MARS"** means any product, service, plan, or program, offered or provided to the consumer in exchange for consideration, that is represented, expressly or by implication, to assist or attempt to assist the consumer with any of the following:

1. stopping, preventing, or postponing any mortgage or deed of trust foreclosure sale for the consumer's dwelling, any repossession of the consumer's dwelling, or otherwise saving the consumer's dwelling from foreclosure or repossession;

2. negotiating, obtaining, or arranging a modification of any term of a dwelling loan, including a reduction in the amount of interest, principal balance, monthly payments, or fees;

3. obtaining any forbearance or modification in the timing of payments from any dwelling loan holder or servicer on any dwelling loan;

4. negotiating, obtaining, or arranging any extension of the period of time within which the consumer may (i) cure his or her default on a dwelling loan, (ii) reinstate his or her dwelling loan, (iii) redeem a dwelling, or (iv) exercise any right to reinstate a dwelling loan or redeem a dwelling;

5. obtaining any waiver of an acceleration clause or balloon payment contained in any promissory note or contract secured by any dwelling; or

6. negotiating, obtaining, or arranging (i) a short sale of a dwelling, (ii) a deed-in-lieu of foreclosure, (iii) or any other disposition of a dwelling loan other than a sale to a third party that is not the dwelling loan holder.

The foregoing shall include any manner of claimed assistance, including, but not limited to, auditing or examining a consumer's mortgage or home loan application and offering to provide or providing legal services, or offering to sell a consumer a plan or subscription to a service that provides such assistance.

K. **"Person"** means any individual, group, unincorporated association, limited or general partnership, corporation or other business entity.

L. **"Plaintiff"** means the Federal Trade Commission ("Commission" or "FTC").

M. **"Receivership Entities"** means Corporate Defendants and any entities that are part of Defendants' common enterprise, including but not limited to Broad Base Inc. and Federal Management Systems Inc. "Receivership Entities" includes businesses that lack formal legal structure (such as businesses operating under fictitious business names), but that otherwise satisfy the definition of "Receivership Entity."

N. **"Temporary Receiver"** means the Temporary Receiver appointed in this Order. The term "Temporary Receiver" also includes any deputy receivers or agents as may be named by the Temporary Receiver.

I. PROHIBITED REPRESENTATIONS

IT IS THEREFORE ORDERED that Defendants, Defendants' officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the advertising, marketing, promotion, offering for sale, sale, or performance of any service or product, are temporarily restrained and enjoined from misrepresenting or assisting others in misrepresenting, expressly or by implication:

A. Defendants are likely to obtain relief for consumers, including "at least $75,000" or consumers' homes free and clear;

B. Defendants will seek to void consumers' mortgages;

C. Defendants have a team of experienced lawyers and personnel to litigate mass joinder cases alleging lender fraud and related claims; and

D. Defendants will file lawsuits on particular consumers' behalf.

II. PRESERVATION OF RECORDS AND TANGIBLE THINGS

IT IS FURTHER ORDERED that Defendants, Defendants' officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with the advertising, marketing, promotion, offering for sale, sale, or provision of any product or service, are hereby temporarily restrained and enjoined from destroying, erasing, mutilating, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly, any Documents or records that relate to the business practices, or business and personal finances, of Defendants, or an entity directly or indirectly under the control of Defendants.

III. DISABLEMENT OF WEBSITES AND PRESERVATION OF ELECTRONICALLY STORED INFORMATION

IT IS FURTHER ORDERED that, immediately upon service of the Order upon them and pending determination of the FTC's request for a preliminary injunction, (1) any Electronic Data Host and (2) Defendants, Defendants' officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, shall:

A. Immediately take all necessary steps to ensure that any Internet website used by Defendants for the advertising, marketing, promotion, offering for sale, sale, or provision of services or products relating to consumers' mortgages or containing statements or representations prohibited by Section I of this Order cannot be accessed by the public; and

B. Prevent the alteration, destruction or erasure of any (1) Internet website used by Defendants for the advertising, marketing, promotion, offering for sale, sale, or provision of services or products relating to consumers' mortgages by preserving such websites in the format in which they are maintained currently and (2) any electronically stored information stored on behalf of Corporate Defendants, or entities in active concert or participation with any of them.

IV. SUSPENSION OF INTERNET DOMAIN NAME REGISTRATIONS

IT IS FURTHER ORDERED that, pending determination of the FTC's request for a preliminary injunction, any domain name registrar shall suspend the registration of any Internet website used by Defendants for the advertising, marketing, promotion, offering for sale, sale, or provision of services or products relating to consumers' mortgages or containing statements or representations prohibited by Section I of this Order and provide immediate notice to counsel for the FTC of any other Internet domain names registered by Defendants, Defendants' officers, agents, servants, employees, and attorneys, and all other persons in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise.

V. PROHIBITION ON USE OF CUSTOMER INFORMATION

IT IS FURTHER ORDERED that Defendants, and Defendants' officers, agents, directors, servants, employees, salespersons, and attorneys, as well as all other persons or entities in active concert or participation with them, who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any trust, corporation, subsidiary, division, or other device, are hereby temporarily restrained and enjoined from using, benefitting from, selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, email address, Social Security number, credit card number, debit card number, bank account number, any financial account number, or any data that enables access to any customer's account, or other identifying information of any person which any Defendant obtained prior to when this Order is signed in connection with the marketing or sale of any good or service, including those who were contacted or are on a list to be contacted by any of the Defendants; provided that Defendants may disclose such identifying information to the Temporary Receiver, a law enforcement agency, or as required by any law, regulation, or court order.

VI. ASSET FREEZE

IT IS FURTHER ORDERED that Defendants, and their officers, agents, servants, employees, and attorneys, and all other persons or entities directly or indirectly under the control of any of them, and all other persons or entities in active concert or participation with any of them who receive actual notice of this Order are hereby temporarily restrained and enjoined from directly or indirectly:

A. Transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any Assets, or any interest therein, wherever located, including outside the United States, that are:

1. Asset Freeze Accounts;

2. owned or controlled, directly or indirectly, by any Defendant, in whole or in part, or held, in whole or in part, for the benefit of any Defendant;

3. in the actual or constructive possession of any Defendant;

4. owned, controlled by, or in the actual or constructive possession of any corporation, partnership, or other entity directly or indirectly owned, managed, or controlled by, or under common control with any Defendant, including any entity acting under a fictitious name owned by or controlled by any Defendant, and any Assets held by, for, or under the name of any Defendant at any bank or savings and loan institution, or with any broker-dealer, escrow agent, title

company, commodity trading company, payment processing company, precious metal dealer, or other Financial Institution or depository of any kind;

B. Opening or causing to be opened any safe deposit boxes titled in the name of any Defendant, or subject to access by any Defendant;

C. Incurring charges or cash advances on any credit card, debit card, or checking card issued in the name, singly or jointly, of any Defendant;

D. Obtaining a personal or secured loan;

E. Incurring liens or encumbrances on real property, personal property or other Assets in the name, singly or jointly, of any Defendant; and

F. Cashing any checks or depositing any money orders or cash received from consumers, clients, or customers of any Defendant.

IT IS FURTHER ORDERED that the Assets affected by this Section shall include: (1) all Assets of Defendants as of the time this Order is signed; and (2) for Assets obtained after the time this Order is signed, those Assets of Defendants that are derived, directly or indirectly, from the Defendants' activities as described in the Commission's Complaint, including the activities of any Receivership Entity. This Section does not prohibit transfers to the Temporary Receiver, as specifically required in the Section titled "Transfer of Funds to the Temporary Receiver by Financial Institutions and Other Third Parties," nor does it prohibit the repatriation of foreign Assets, as specifically required in the Section titled "Repatriation of Foreign Assets" of this Order.

VII. RETENTION OF ASSETS AND DOCUMENTS BY THIRD PARTIES

IT IS FURTHER ORDERED that, pending determination of the FTC's request for a preliminary injunction, any Financial Institution, business entity, Electronic Data Host, or person served with a copy of this Order that holds, controls, or maintains custody of any account, Document, or Asset of, on behalf of, in the name of, for the benefit of, subject to withdrawal by, subject to access or use by, or under the signatory power of any Defendant, or other party subject to the Asset Freeze above, or has held, controlled, or maintained any such account, Document, or Asset, shall:

A. Hold, preserve, and retain within such entity's or person's control, and prohibit the withdrawal, removal, alteration, assignment, transfer, pledge, hypothecation, encumbrance, disbursement, dissipation, conversion, sale, liquidation, or other disposal of such account, Document, or Asset held by or under such entity's or person's control, except as directed by further order of the Court;

B. Provide the Temporary Receiver immediate access to electronically stored information stored, hosted, or otherwise maintained on behalf of any Defendants for forensic imaging;

C. Deny access to any safe deposit boxes that are either titled in the name of, individually or jointly, or subject to access by, any Defendant or other party subject to the Asset Freeze above; and

D. Provide to counsel for the FTC, within one (1) business day, a sworn statement setting forth:

1. the identification of each account or Asset titled in the name, individually or jointly, or held on behalf of or for the benefit of, subject to withdrawal by, subject to access or use by, or under the signatory power of any Defendant or other party subject to the Asset Freeze above;

2. the balance of each such account, or a description of the nature and value of such Asset, as of the close of business on the day on which this Order is served, the day before the Order is served, and the average daily balance for the six months before the Order is served;

3. the identification of any safe deposit box that is either titled in the name of, individually or jointly, or is otherwise subject to access or control by, any Defendant or other party subject to the Asset Freeze above; and

4. if the account, safe deposit box, or other Asset has been closed or removed, the date closed or removed, the balance on said date, and the name or the person or entity to whom such account or other Asset was remitted;

E. Provide counsel for the FTC, within three (3) business days after being served with a request, copies of all Documents pertaining to such account or Asset, including but not limited to: account statements, account applications, signature cards, underwriting files, checks, deposit tickets, transfers to and from the accounts, wire transfers, all other debit and credit instruments or slips, 1099 forms, and safe deposit box logs; and

F. Cooperate with all reasonable requests of the FTC relating to this Order's implementation.

IT IS FURTHER ORDERED that this Section shall apply to both existing Documents, records, and Assets and to Documents, records, and Assets acquired after the date this Order is signed. This Section does not prohibit transfers to the Temporary Receiver, as specifically required in the Section titled "Transfer of Funds to the Temporary Receiver by Financial Institutions and Other Third Parties," nor does it prohibit the repatriation of foreign Assets, as specifically required in the Section titled "Repatriation of Foreign Assets" of this Order.

VIII. FINANCIAL STATEMENTS AND ACCOUNTING

IT IS FURTHER ORDERED that each Defendant, within three (3) business days of service of this Order, shall prepare and deliver to counsel for the FTC:

A. For Individual Defendants, a completed financial statement, accurate as of the date of service of this Order upon such Defendant, in the form of Attachment A to this Order captioned "Financial Statement of Individual Defendant."

B. For Corporate Defendants, a completed financial statement, accurate as of the date of service of this Order upon such Defendant (unless otherwise agreed upon with FTC counsel), in the form of Attachment B to this Order captioned "Financial Statement of Corporate Defendant."

IX. CREDIT REPORTS

IT IS FURTHER ORDERED that the FTC may obtain credit reports concerning any Defendant pursuant to Section 604(a)(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(a)(1), and that, upon written request, any credit reporting agency from which such reports are requested shall provide them to the FTC.

X. REPATRIATION OF FOREIGN ASSETS

IT IS FURTHER ORDERED that, within three (3) days following the service of this Order, each Defendant shall:

A. Transfer to the territory of the United States and provide the FTC and the Temporary Receiver with a full accounting of all Assets, Documents, and records outside of the territory of the United States that are:

1. owned or controlled by;
2. subject to access by;
3. held in whole or in part for the benefit of;
4. belonging to any entity that is directly or indirectly owned, managed, or under the control of; or
5. belonging to a person under the control of any Defendant;

B. Hold all repatriated Assets, Documents, and records as required by the Asset Freeze imposed by this Order; and

C. Provide the FTC access to all records of accounts or Assets of the Defendants held by any Financial Institution or other person located outside the territorial United States by signing the Consent to Release of Financial Records attached to this Order as Attachment C and by signing any other Documents required by any person, including any Financial Institution, or other person holding any such Asset.

XI. NON-INTERFERENCE WITH REPATRIATION

IT IS FURTHER ORDERED that Defendants, and each of their successors, assigns, members, officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any entity, corporation, subsidiary, division, affiliate or other device, are hereby temporarily restrained and enjoined from taking any action, directly or indirectly, that may result in the encumbrance or dissipation of foreign Assets, or in the hindrance of the repatriation required by the preceding "Repatriation of Assets" Section of this Order, including, but not limited to:

A. Sending any statement, letter, fax, email or wire transmission, or telephoning or engaging in any other act, directly or indirectly, that results in a determination by a foreign trustee or other entity that a "duress" event has occurred under the terms of a foreign trust agreement until such time that all Assets have been fully repatriated pursuant to the "Repatriation of Assets" Section of this Order; or

B. Notifying any trustee, protector, or other agent of any foreign trust or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a court order, until such time that all Assets have been fully repatriated pursuant to "Repatriation of Assets" Section of this Order.

XII. RECORDKEEPING AND BUSINESS OPERATIONS

IT IS FURTHER ORDERED that Defendants are hereby temporarily restrained and enjoined from:

A. Failing to maintain Documents that, in reasonable detail, accurately, fairly, and completely reflect their incomes, disbursements, transactions, and use of money;

B. Creating, operating, or exercising any control over any business entity, including any partnership, limited partnership, joint venture, sole proprietorship, limited liability company or corporation, without first providing the Commission with a written statement disclosing: (1) the name of the business entity; (2) the address and telephone number of the business entity; (3) the names of the business entity's officers, directors, principals, managers, and employees; and (4) a detailed description of the business entity's intended activities; and

C. Affiliating with, becoming employed by, or performing any work for any business that is not a named Defendant in this action without first providing the Commission with a written statement disclosing: (1) the name of the business; (2) the address and telephone number of the business; and (3) a detailed description of the nature of the business or employment and the nature of the Defendant's duties and responsibilities in connection with that business or employment.

XIII. APPOINTMENT OF TEMPORARY RECEIVER

IT IS FURTHER ORDERED that Thomas W. McNamara of San Diego, California is appointed Temporary Receiver for the Receivership Entities, with the full power of an equity Receiver. The Temporary Receiver shall be the agent of this Court and solely the agent of this Court in acting as Temporary Receiver under this Order. The Temporary Receiver shall be accountable directly to this Court. The Temporary Receiver shall comply with all local rules and laws governing federal equity receivers.

XIV. COOPERATION WITH THE TEMPORARY RECEIVER

IT IS FURTHER ORDERED that Defendants shall fully cooperate with and assist the Temporary Receiver. Defendants' cooperation and assistance shall include, but not be limited to, providing any information to the Temporary Receiver that the Temporary Receiver deems necessary to exercise the authority and discharge the responsibilities of the Temporary Receiver under this Order; providing any login, password, or biometric identifier required to access any computer or electronic files or information in or on any medium; and advising all persons who owe money to the Receivership Entities that all debts should be paid directly to the Temporary Receiver. Defendants are hereby restrained and enjoined from directly or indirectly:

A. Transacting any of the business of the Receivership Entities;

B. Excusing debts owed to the Receivership Entities;

C. Destroying, secreting, defacing, transferring, or otherwise altering or disposing of any Documents of the Receivership Entities;

D. Transferring, receiving, altering, selling, encumbering, pledging, assigning, liquidating, or otherwise disposing of any Assets owned, controlled, or in the possession or custody of, or in which an interest is held or claimed by, the Receivership Entities, or the Temporary Receiver;

E. Failing to provide any assistance or information requested by the Temporary Receiver in connection with obtaining possession, custody, or control of any Assets within the receivership estate that the Receiver or the FTC has identified; or

F. Doing any act or thing whatsoever to interfere with the Temporary Receiver's taking and keeping custody, control, possession, or managing of the Assets or Documents subject to this receivership; or to harass or interfere with the Temporary Receiver in any way; or to interfere in any manner with the exclusive jurisdiction of this Court over the Assets or Documents of the Receivership Entities; or to refuse to cooperate with the Temporary Receiver or the Temporary

Receiver's duly authorized agents in the exercise of their duties or authority under any Order of this Court.

XV. DUTIES AND AUTHORITY OF TEMPORARY RECEIVER

IT IS FURTHER ORDERED that the Temporary Receiver is directed and authorized to accomplish the following:

A. Assume full control of the Receivership Entities by removing, as the Temporary Receiver deems necessary or advisable, any director, officer, independent contractor, employee, attorney, or agent of any Receivership Entity from control of, management of, or participation in, the affairs of the Receivership Entities;

B. Take exclusive custody, control, and possession of all Assets and Documents of, or in the possession, custody, or under the control of, any Receivership Entity, wherever situated. The Temporary Receiver shall have full power to divert mail and to sue for, collect, receive, take possession of, hold, and manage all Assets and Documents of the Receivership Entities and other persons or entities whose interests are now held by or under the direction, possession, custody, or control of the Receivership Entities;

C. Take all steps necessary to secure the business premises of the Receivership Entities, which may include, but are not limited to, taking the following steps as the Temporary Receiver deems necessary or advisable: (1) serving and filing this Order; (2) completing a written inventory of all receivership Assets; (3) obtaining pertinent information from all employees and other agents of the Receivership Entities, including, but not limited to, the name, home address, Social Security number, job description, method of compensation, and all accrued and unpaid commissions and compensation of each such employee or agent; (4) video-recording and/or photographing all portions of the location at which any Receivership Entity conducts business or has Assets; (5) changing the locks and disconnecting any computer networks or other means of access to electronically stored information or other Documents maintained at that location; or (6) requiring any persons present on the premises at the time this Order is served to leave the premises, to provide the Temporary Receivers with proof of identification, and/or to demonstrate to the satisfaction of the Temporary Receiver that such persons are not removing from the premises Documents or Assets of the Receivership Entities. Such authority shall include, but not be limited to, the authority to order any owner, director, officer, employee, or agent of the Receivership Entities to leave the business premises;

D. Conserve, hold, and manage all receivership Assets, and perform all acts necessary or advisable to preserve the value of those Assets, in order to prevent any irreparable loss, damage, or injury to consumers, including, but not limited to, obtaining an accounting of the Assets and preventing the transfer, withdrawal, or misapplication of Assets;

E. Enter into contracts and purchase insurance as advisable or necessary;

F. Prevent the inequitable distribution of Assets and determine, adjust, and protect the interests of consumers and creditors who have transacted business with the Receivership Entities;

G. Manage and administer the business of the Receivership Entities until further order of this Court by performing all incidental acts that the Temporary Receiver deems to be advisable or necessary, which includes retaining, hiring, or dismissing any employees, independent contractors, or agents;

H. Continue and conduct the businesses of the Defendants in such manner, to such extent, and for such duration as the Temporary Receiver may in good faith deem to be necessary or appropriate to operate the businesses profitably, using the Assets of the receivership estate, and lawfully, if at all;

I. Choose, engage, and employ attorneys, accountants, appraisers, investigators, and other independent contractors and technical specialists, as the Temporary Receiver deems advisable or necessary in the performance of their duties and responsibilities, including but not limited to the law firm in which the Receiver is a partner;

J. Make payments and disbursements from the receivership estate that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Order. The Temporary Receiver shall apply to the Court for prior approval of any payment of any debt or obligation incurred by the Receivership Entities prior to the date this Order is signed, except payments that the Temporary Receiver deems necessary or advisable to secure Assets of the Receivership Entities, such as rental payments;

K. Collect any money due or owing to the Receivership Entities;

L. Institute, compromise, adjust, appear in, intervene in, or become party to such actions or proceedings in state, federal or foreign courts that the Temporary Receiver deems necessary and advisable to preserve or recover the Assets of the Receivership Entities, or to carry out the Temporary Receiver's mandate under this Order;

M. Defend, compromise, adjust, or otherwise dispose of any or all actions or proceedings instituted against the Receivership Entities or the Temporary Receiver that the Temporary Receiver deems necessary and advisable to preserve the Assets of the Receivership Entities, or to carry out the Temporary Receiver's mandate under this Order;

N. Take depositions and issue subpoenas to obtain Documents and records pertaining to the receivership and compliance with this Order. Subpoenas may be served by electronic mail, by agents or attorneys of the Temporary Receiver and by agents of any process server retained by the Temporary Receiver;

O. Open one or more bank accounts as designated depositories for funds of the Receivership Entities. The Temporary Receiver shall deposit all funds of the Receivership Entities in such a designated account and shall make all payments and disbursements from the receivership estate from such an account;

P. Maintain accurate records of all receipts and expenditures made by the Temporary Receiver;

Q. Cooperate with reasonable requests for information or assistance from any state or federal law enforcement agency;

R. Permit, within the Temporary Receiver's discretion, copies of client files to be given to a lawyer working for a Receivership Entity if the files relate to a matter other than one within the scope of the allegations in the Complaint;

S. File, within the Temporary Receiver's discretion, notices in any ongoing litigation being conducted by a lawyer working for or with the Receivership Entity, informing that court and the parties, that the Receivership Entities have been placed in a receivership, that the Receivership Entities are withdrawing from the case, and further seek leave of that court for a stay of all proceedings for at least ninety (90) days to permit any client of the Receivership Entities to obtain replacement counsel, ***provided, however***, that the Temporary Receiver will not be required to litigate, or hire attorneys to litigate, any such pending cases; and

T. Identify all attorney-client files held by a Receivership Entity; take reasonable steps to contact current clients to inform them of the receivership; take reasonable steps to advise current clients that the Temporary Receiver will not be providing any attorney services and that the clients may seek replacement counsel; and return any client files to the clients upon request; ***provided, however***, that the Temporary Receiver maintain a copy of all such client files; ***and provided further***, the Temporary Receiver is authorized to work with representatives of the California State Bar to perform these actions.

XVI. TRANSFER OF FUNDS TO THE TEMPORARY RECEIVER BY FINANCIAL INSTITUTIONS AND OTHER THIRD PARTIES

IT IS FURTHER ORDERED that, upon service of a copy of this Order, any Financial Institution shall cooperate with all reasonable requests of counsel for the FTC and the Temporary Receiver relating to implementation of this Order, including transferring funds at the Temporary Receiver's direction and producing records related to the Assets and sales of the Receivership Entities.

XVII. TEMPORARY RECEIVER'S REPORTS

IT IS FURTHER ORDERED that the Temporary Receiver shall report to this Court at least one day before the date set for the hearing regarding the Preliminary Injunction, regarding: (1) the steps taken by the Temporary Receiver to implement the terms of this Order; (2) the value of all liquidated and unliquidated Assets of the Receivership Entities; (3) the sum of all liabilities of the Receivership Entities; (4) the steps the Temporary Receiver intends to take in the future to: (a) prevent any diminution in the value of Assets of the Receivership Entities; (b) pursue receivership Assets from third parties; and (c) adjust the liabilities of the Receivership Entities, if appropriate; and (5) any other matters which the Temporary Receiver believes should be brought to the Court's attention. Provided, however, if any of the required information would hinder the Temporary Receiver's ability to pursue receivership Assets, the portions of the Temporary Receiver's report containing such information may be filed under seal and not served on the parties.

XVIII. COMPENSATION OF THE TEMPORARY RECEIVER

IT IS FURTHER ORDERED that the Temporary Receiver, and all persons or entities retained or hired by the Temporary Receiver as authorized under this Order, shall be entitled to reasonable compensation for the performance of duties undertaken pursuant to this Order and for the cost of actual out-of-pocket expenses incurred by them from the Assets now held by or in the possession or control of, or which may be received by, the Receivership Entities. The Temporary Receiver shall file with the Court and serve on the parties a request for the payment of reasonable compensation at the time of the filing of any report required by the "Temporary Receiver's Reports" Section of this Order. The Temporary Receiver shall not increase the fees or rates used as the bases for such fee applications without prior approval of the Court.

XIX. TEMPORARY RECEIVER'S ACCESS TO BUSINESS PREMISES AND RECORDS

IT IS FURTHER ORDERED that:

A. The Temporary Receiver, and his representatives, agents, and assistants, shall have immediate access to all business premises and storage facilities, owned, controlled, or used by any Receivership Entity, including but not limited to the offices and facilities at 6 Hutton Centre Drive, Suite 1000, Santa Ana, CA 92707, and any offsite commercial mail boxes or virtual offices used by any Receivership Entity. The Temporary Receiver is authorized to employ the assistance of law enforcement as he deems necessary to effect service and peacefully implement this Order. The Temporary Receiver may exclude Receivership Entities and their employees from part or all of the business premises during the immediate access. The purpose of the immediate access shall be to effect service and to inspect and copy the business and financial records of the Receivership Entities, including forensic imaging of electronically stored information. Such business records include, but are not limited to, correspondence, contracts, emails, and financial data;

B. The Temporary Receiver and its representatives, agents, and assistants, shall have the right to remove materials from the above-listed premises for inspection and copying;

C. Receivership Entities and all employees or agents of Receivership Entities shall provide the Temporary Receiver with any necessary means of access to Documents and records, including, without limitation, the locations of the Receivership Entities' business premises, keys and combinations to locks, computer access codes, and storage area access information;

D. If any Individual Defendant possesses a smartphone or tablet on receivership premises, they will turn over the device to the Receiver for imaging. Within two business days, the Temporary Receiver will return the device; and

E. If any Documents, computers, smartphones, tablets, or electronic data storage devices containing information related to the business practices or finances of the Receivership Entities are at a location other than those listed herein, including but not limited to, the personal residence(s) of the Defendants, then, immediately upon notice of this Order, Defendants shall produce to the Temporary Receiver all such Documents, computers, smartphones, tablets, or electronic data storage devices. To prevent the destruction of electronic data, upon service of this Order upon any Receivership Entity, any computers, smartphones, tablets, or electronic data storage devices containing such information shall be powered down (turned off) in the normal course for the operating systems used on such devices and shall not be used until produced for copying and inspection, along with any codes needed for access. For any smartphone or tablet that contains information related to the business practices or finances of the Receivership Entities that is in the personal possession of an Individual Defendant, the Temporary Receiver shall image that device and return it to the Individual Defendant within two business days.

XX. PARTIES' ACCESS TO BUSINESS PREMISES AND RECORDS

IT IS FURTHER ORDERED that the Temporary Receiver shall allow the FTC, the Defendants, and their representatives reasonable access to the premises of the Receivership Entities. The purpose of this access shall be to inspect, inventory, and copy any Documents and other property owned by, or in the possession of, the Receivership Entities, provided that those Documents and property are not removed from the premises without the permission of the Temporary Receiver. The Temporary Receiver shall have the discretion to determine the time, manner, and reasonable conditions of such access. The Temporary Receiver will segregate all materials subject to an attorney-client privilege held by a Receivership Entity's clients and shall not make these materials available to either the FTC or Defendants without the clients' consent. The FTC's access to any Documents pursuant to this provision shall not provide grounds for any Defendant to object to any subsequent request for Documents served by the FTC.

XXI. LIMITED EXPEDITED DISCOVERY

IT IS FURTHER ORDERED that the Temporary Receiver and the FTC are granted leave to conduct certain expedited discovery and that in lieu of the time periods, notice provisions, and other requirements of the applicable Local Rules for this District and Rules 26, 30, 34, and 45 of the Federal Rules of Civil Procedure, the Temporary Receiver and the FTC are granted leave to:

A. Depose, on three (3) days' notice, any party or non-party for the purpose of discovering: (1) the nature, location, status, and extent of Assets of Defendants or their affiliates or subsidiaries; (2) the nature and location of Documents and business records of Defendants or their affiliates or subsidiaries; and (3) compliance with this Order. Any such depositions shall not be counted toward any deposition limit set forth in the Federal Rules of Civil Procedure or this Court's Local rules and shall not preclude the FTC from subsequently deposing the same person during discovery on the merits in this case. Depositions may be taken by telephone, video conference, or other remote means. Any deposition taken pursuant to this Section that has not been reviewed and signed by the deponent may be used by any party for purposes of any preliminary injunction hearing;

B. Serve upon parties interrogatories or requests for production of Documents or inspection that require a response, production or inspection within four (4) days of service, and may serve subpoenas upon non-parties that direct production or inspection within seven (7) days of service, for the purpose of discovering: (1) the nature, location, status, and extent of Assets of Defendants or their affiliates or subsidiaries; (2) the nature and location of Documents and business records of Defendants or their affiliates or subsidiaries; and (3) compliance with this Order; provided, however, that forty-eight (48) hours' notice shall be deemed sufficient for the production of any such Documents that are maintained or stored as electronic data. Any such interrogatories or requests for production or inspection shall not count toward any limit on discovery set forth in the Federal Rules of Civil Procedure or this Court's Local Rules;

C. For purposes of this Section, serve deposition notices and other discovery requests upon the parties to this action personally or by facsimile, email, certified or registered mail, or private courier (including a process server) with a receipt from the courier showing delivery; and

D. Pursuant to Fed. R. Civ. P. 45, subpoena Documents immediately from any Financial Institution, business entity, Electronic Data Host, or person served with a copy of this Order that holds, controls, or maintains custody of any account, Document, or Asset of, on behalf of, in the name of, for the benefit of, subject to withdrawal by, subject to access or use by, or under the signatory power of any Defendant or other party subject to the Asset Freeze above, or has held, controlled, or maintained any such account, Document, or Asset. The recipient shall respond to such subpoena within three (3) business days after service. The FTC may effect service by electronic mail.

XXII. BANKRUPTCY PETITIONS

IT IS FURTHER ORDERED that, in light of the appointment of the Temporary Receiver, the Receivership Entities are hereby prohibited from filing petitions for relief under the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.*, without prior permission from this Court.

XXIII. PRE-EXISTING ORDERS

IT IS FURTHER ORDERED that nothing herein modifies any existing Order in any way, including the Orders governing Damian Kutzner. *See FTC v. GM Funding, Inc.*, SACV02-1026 DOC (C.D. Cal.), Stipulated Judgment and Order for Permanent Injunction as to Defendants GM Funding, Inc., Robert D. Kutzner, Global Mortgage Funding, Inc., and Damian R. Kutzner (May 5, 2003); *U.S. v. Global Mortgage Funding, Inc.*, SACV07-1275 DOC (C.D. Cal.), Stipulated Judgment and Order for Permanent Injunction (July 17, 2009). The FTC may take discovery and pursue any other measure any existing Order permits.

XXIV. STAY OF ACTIONS

IT IS FURTHER ORDERED that:

A. Except by leave of this Court, during the pendency of the Temporary Receivership ordered herein, the Receivership Entities and all customers, principals, investors, creditors, stockholders, lessors, and other persons seeking to establish or enforce any claim, right, or interest against or on behalf of the Receivership Entity, and all others acting for or on behalf of such persons, including attorneys, trustees, agents, sheriffs, constables, marshals, and other officers and their deputies, and their respective attorneys, servants, agents, and employees be and are hereby stayed from:

1. Commencing, prosecuting, entering, or enforcing any suit or proceeding, except that such actions may be filed to toll any applicable statute of limitations;

2. Accelerating the due date of any obligation or claimed obligation; filing or enforcing any lien; taking or attempting to take possession, custody, or control of any Asset; attempting to foreclose, forfeit, alter, or terminate any interest in any Asset, whether such acts are part of a judicial proceeding, are acts of self-help, or otherwise;

3. Executing, issuing, serving, or causing the execution, issuance or service of, any legal process, including, but not limited to, attachments, garnishments, subpoenas, writs of replevin, writs of execution, or any other form of process, whether specified in this Order or not; or

4. Doing any act or thing whatsoever to interfere with the Temporary Receiver's taking custody, control, possession, or management of Assets or Documents subject to this receivership; or to harass or interfere with the Temporary Receiver in any way; or to interfere in any manner with the exclusive jurisdiction of this Court over the Assets or Documents of the Receivership Entities.

B. This Section does not stay:

1. The commencement or continuation of a criminal action or proceeding;

2. The commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power;

3. The enforcement of a judgment, other than a money judgment, obtained in an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power, including but not limited to any actions (including discovery) taken by the FTC in enforcing the Orders in the related matters, *FTC v. GM Funding, Inc.*, SACV02-1026 DOC (C.D. Cal.), *U.S. v. Global Mortgage Funding, Inc.*, SACV07-1275 DOC (C.D. Cal.); or

4. The issuance to the Receivership Entities of a notice of tax deficiency.

XXV. ACKNOWLEDGMENT OF RECEIPT OF ORDER BY DEFENDANTS

IT IS FURTHER ORDERED that each Defendant, within three (3) business days of receipt of this Order, must submit to counsel for the FTC a truthful sworn statement acknowledging receipt of this Order.

XXVI. CORRESPONDENCE WITH PLAINTIFF

IT IS FURTHER ORDERED that, for the purposes of this Order, because mail addressed to the FTC is subject to delay due to heightened security screening, all correspondence and service of pleadings on Plaintiff shall be sent via electronic submission and Federal Express to:

Benjamin Theisman
Gregory Madden
Federal Trade Commission
600 Pennsylvania Ave., NW, Mail Drop CC-9528
Washington, DC 20580
Telephone: (202) 326-2223, -2426
btheisman@ftc.gov, gmadden@ftc.gov

XXVII. SERVICE OF THIS ORDER

IT IS FURTHER ORDERED that copies of this Order may be served by facsimile, email, hand-delivery, personal or overnight delivery, or U.S. Mail, by agents and employees of the FTC or any state or federal law enforcement agency or by private process server, upon any Financial Institution or other entity or person that may have possession, custody, or control of any Documents or Assets of any Defendant, or that may otherwise be subject to any provision of this Order. Service upon any branch or office of any Financial Institution shall effect service upon the entire Financial Institution.

XXVIII. PRELIMINARY INJUNCTION HEARING

IT IS FURTHER ORDERED, pursuant to Fed. R. Civ. P. 65(b), that each of the Defendants shall appear before this Court on the 15th day of June, 2016, at 8:00 AM, Pacific Daylight Time, at the United States District Courthouse, Courtroom 14, Los Angeles, California, to show cause, if there is any, why this Court should not enter a preliminary injunction enjoining the violations of law alleged in the FTC's Complaint, continuing the freeze of their Assets, and imposing such additional relief as may be appropriate.

IT IS FURTHER ORDERED that the Defendants shall file with the Court and serve on the FTC's counsel any answering pleadings, affidavits, motions, expert reports, declarations, witness lists with detailed summaries of expected witness testimony, and/or legal memoranda, no later than seven days prior to the hearing. The FTC may file responsive or supplemental pleadings, materials, affidavits, witness lists with detailed summaries of expected witness testimony, and/or memoranda with the Court and serve them on Defendants' counsel no later than one day prior to that hearing. Such affidavits, pleadings, motions, expert reports, declarations, witness lists with detailed summaries of expected witness testimony, legal memoranda and/or oppositions must be served by electronic mail (or Federal Express, if electronic mail is impractical), and must be received by the other party no later than the deadlines set forth in this Section.

XXIX. DURATION OF ORDER

IT IS FURTHER ORDERED that the Temporary Restraining Order granted herein shall expire on the 15th day of June, 2016, at 4:00 PM, Pacific Daylight Time, unless within such time the Order, for good cause shown, is extended for an additional period not to exceed fourteen (14) calendar days, or unless it is further extended pursuant to Federal Rule of Civil Procedure 65.

XXX. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes of construction, modification, and enforcement of this Order.

The Court sets this matter for hearing on June 15, 2016 at 8:00 am, in Courtroom 14.

IT IS SO ORDERED, this 1st day of June, 2016, at 4:00 PM, Pacific Daylight Time.

IT IS HEREBY ORDERED

Dated: June 1, 2016

HONORABLE BEVERLY REID O'CONNELL
UNITED STATES DISTRICT COURT JUDGE

EXHIBIT 2

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CIVIL MINUTES – GENERAL

Case No.	**SA CV 16-00999 BRO (AFMx)**	Date	June 15, 2016
Title	**Federal Trade Commission v. Kutzner et al**		

Present: The Honorable **BEVERLY REID O'CONNELL, United States District Judge**

Renee A. Fisher	Myra Ponce	N/A
Deputy Clerk	Court Reporter	Tape No.

Attorneys Present for Plaintiffs:	Attorneys Present for Defendants:
Benjamin J Theisman Gregory J Madden	David W Wiechert Vito Torchia Jr Stephen P Farkas Charles T. Marshall Jessica Munk Thomas W. McNamara - Receiver

Proceedings: PRELIMINARY INJUNCTION HEARING (Held and Completed)

Matter called. Counsel states their appearances for the record. Court, Counsel and the individual parties confer. The Preliminary Injunction hearing is continued as to the appearing parties to July 1, 2016 at 8:30 am. Opposition to the Preliminary injunction is due on or before June 27, 2016 at 9:00 a.m. Any Reply is due on or before June 29, 2016 at 5:00 pm.

Defendants are ORDERED to file a Declaration as to whether they will be opposing the Preliminary Injunction and which witnesses they intend to cross examine no later than Friday, June 24, 2016 at 5:00 pm. The Plaintiff's response will be due on or before June 28, 2016 at 9:00 a.m.

As to all of the non-appearing parties, who were properly noticed, plaintiff is ORDERED to submit a proposed Preliminary Injunction Order.

The Court is extending the Temporary Restraining Order until July 1, 2016 at 5:00 pm.

The Court intends to issue an Order to Show Cause Re Contempt. The hearing will take place on July 27, 2016 at 9:00 a.m. Any position papers are due on or before June 25, 2016 at 9:00 a.m.

The Court will entertain any request for costs associated with the consumer witnesses appearing and will also entertain any request for video conferencing for the continued hearing.

IT IS SO ORDERED

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